

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	x	
	:	Chapter 11
In re	:	
	:	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
-----	x	

**STIPULATION OF UNDISPUTED FACTS FOR HEARING ON
LIABILITY ISSUES (PROOFS OF CLAIM NUMBERS 14824 AND 14826)**

Debtor Lehman Brothers Holdings Inc. ("LBHI") and Claimants Canary Wharf Management Ltd., Heron Quays (HQ2) T1 Limited, and Heron Quays (HQ2) T2 Limited (collectively, "Canary Wharf"), hereby stipulate and agree that the following facts are uncontested for purposes of Proofs of Claim Numbers 14824 and 14826 and LBHI's Objection thereto:

1. A lease for the property at 25 Bank Street in London, England, dated March 16, 2005 (the "Lease") was executed by LBHI, Lehman Brothers Limited ("LBL"), a subsidiary of LBHI, Canary Wharf, and Canary Wharf Holdings Limited. A copy of the Lease is attached hereto as Exhibit A, and as Exhibit 6 to the Declaration of Marc De Leeuw, executed on October 12, 2012 ("De Leeuw Declaration"), accompanying Canary Wharf's October 12, 2012 Response to LBHI's Objection to Proofs of Claim Numbers 14824 and 14826 (ECF# 31342-7).

2. The Lease states (§ 8.16) that it is governed by the laws of England.

3. The Lease is for a term of 30 years commencing July 3, 2003.

4. On September 15, 2008, LBHI filed for bankruptcy in the United States Bankruptcy Court for the Southern District of New York, and LBL was placed into administration in the United Kingdom.

5. On September 17, 2009, Canary Wharf filed Proofs of Claim Numbers 14824 and 14826 against LBHI in this proceeding.

6. LBL, its administrators, and Canary Wharf entered into an agreement, dated December 3, 2010, pursuant to which Canary Wharf would forfeit the Lease (the "LBL Forfeiture Agreement"). The LBL Forfeiture Agreement is attached hereto as Exhibit B, and as Exhibit B to LBHI's Objection to Proofs of Claim Number 14824 and 14826 in this action (ECF# 30055).

Dated: June 13, 2013
New York, New York

By: 

Peter D. Isakoff
Robert J. Lemons
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Tel: (212) 310-8000
Fax: (212) 310-8007

*Attorneys for Lehman Brothers
Holdings Inc. and Certain of Its
Affiliates*

By: 

David B. Tulchin
Marc De Leeuw
John J. Jerome
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Tel: (212) 558-4000
Fax: (212) 558-3588

*Attorneys for Canary Wharf Management Ltd.,
Heron Quays (HQ2) T1 Limited and Heron
Quays (HQ2) T2 Limited*